

1 BRUCE D. GOLDSTEIN, State Bar No. 135970
2 County Counsel
3 ANNE L. KECK, State Bar No. 136315
4 Deputy County Counsel
5 County of Sonoma
575 Administration Drive, Room 105A
Santa Rosa, California 95403-2815
Telephone: (707) 565-2421
Facsimile: (707) 565-2624
E-mail: akeck@sonoma-county.org

7 Attorneys for Defendants the County
of Sonoma, Former Sheriff-Coroner William
8 Cogbill, and County employees Michael
Shanahan, Caroline Japp, Jo Weber,
9 Nicholas Honey, Jerry Allen, Betty
Johnson, and Robin Smith

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

14 SALLY STEINHART, No. CV-10-00841 RS

Plaintiff,

17 || COUNTY OF SONOMA, et al..

Defendants.

**STIPULATION FOR ORDERS TO: (1)
EXTEND TIME FOR FILING A THIRD
AMENDED COMPLAINT; (2) EXTEND
TIME TO RESPOND TO COMPLAINT
AND FILE ANTI-SLAPP MOTION;
[PROPOSED] ORDER**

20 This joint stipulation is entered into by and between Plaintiff in pro per, Sally Steinhart
21 (“Plaintiff”), and Defendants the County of Sonoma, former Sheriff-Coroner William Cogbill, and
22 County employees Michael Shanahan, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty
23 Johnson and Robin Smith (collectively, “County Defendants”). Through this stipulation, these
24 parties request that the Court further extend the time for Plaintiff to file a Third Amended Complaint
25 (“TAC”) through May 20, 2011, and to concomitantly extend the time for County Defendants to file
26 a response to the TAC and to file an Anti-SLAPP Motion under California Code of Civil Procedure
27 Section 425.16 through June 28, 2011. Defendant the State Department of Social Services and
28 other named defendants have not appeared in this action, and are not parties to this stipulation.

RECITALS

2 A. Plaintiff initiated this action on February 26, 2010, and filed her First Amended
3 Complaint on June 21, 2010 (Dkt. No. 8). County Defendants responded by filing their Motion to
4 Dismiss the First Amended Complaint and Motion for More Definite Statement on July 26, 2010
5 (Dkt. No. 12) (hereinafter, the “Motions”). The Court resolved the County Defendants’ Motions on
6 February 7, 2011, through its “Order Granting in Part and Denying in Part Motion to Dismiss and
7 Denying Motion for a More Definite Statement” (Dkt. No. 34) (hereinafter, the “2/7/11 Order”).
8 Thereafter, Plaintiff timely filed her Second Amended Complaint on March 9, 2011 (Dkt. No. 38).

9 B. On April 4, 2011, this Court approved a stipulation of the parties and entered an
10 order: (1) permitting Plaintiff to file a TAC through April 29, 2011; (2) providing County
11 Defendants through May 31, 2011, to file a respond to the TAC and an Anti-SLAPP motion under
12 California Code of Civil Procedure Section 425.16; and (3) continuing the Case Management
13 Conference to July 14, 2011, at 10:00 a.m. (Docket No. 41.)

14 C. Plaintiff has requested additional time in which to prepare and file her TAC through
15 May 20, 2011, and County Defendants agree to such request. In return, Plaintiff has agreed to
16 extend the time in which County Defendants may file a response to the TAC, and an Anti-SLAPP
17 Motion under California Code of Civil Procedure Section 425.16, through June 28, 2011.¹ The
18 parties have agreed to retain the current Case Management Conference date of July 14, 2011.

19 D. The parties believe that such additional time is warranted to provide Plaintiff with the
20 opportunity to further research and investigate the claims in her complaint, to conform the TAC to
21 the Court's 2/7/11 Order, and to provide County Defendants with sufficient time in which to
22 respond.

23 WHEREFORE, the parties to this stipulation hereby agree and request entry of a court order
24 as follows:

²⁷ This Court has the discretion under California Code of Civil Procedure Section 425.16(f) to
²⁸ extend the initial 60-day filing period for Anti-SLAPP motions to “any later time upon terms it
deems proper.”

STIPULATION

2 1. The parties request that the time in which Plaintiff may file a third amended
3 complaint in this case be extended through and including May 20, 2011.

4 2. The parties request that time in which County Defendants may file a response to the
5 current Second Amended Complaint or any third amended complaint (if filed) be extended through
6 and including June 28, 2011.

7 3. The parties request that the time in which County Defendants may file their Anti-
8 SLAPP motion under California Code of Civil Procedure Section 425.16 as to certain State Law
9 claims alleged herein be extended through and including June 28, 2011.

10 4. This stipulation does not prevent or preclude the parties from seeking additional relief
11 from this Court, to amend this stipulation and order or otherwise.

Respectfully submitted,

13 | Dated: April 29, 2011

Bruce D. Goldstein, County Counsel

14 By: /s/ Anne L. Keck
15 Anne L. Keck, Deputy County Counsel
Attorneys for County Defendants

17 | Dated: April 29, 2011

Sally Steinhart, Plaintiff in pro per

18 By: /s/ Sally Steinhart
Sally Steinhart

[PROPOSED] ORDER

2 Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing,
3 it is hereby ordered as follows:

4 1. The time in which Plaintiff may file a third amended complaint in this case is extended
5 through and including May 20, 2011.

6 2. The time in which County Defendants may file a response to the current Second
7 Amended Complaint or any third amended complaint (if filed) is extended through and including
8 June 28, 2011.

9 3. The time in which County Defendants may file their Anti-SLAPP motion under
10 California Code of Civil Procedure Section 425.16 as to certain State Law claims alleged herein is
11 extended through and including June 28, 2011.

12 || IT IS SO ORDERED.

13 Date: 4/29/11


HONORABLE RICHARD SEBOR
United States District Judge